

REMARKS

Favorable reconsideration of this application is respectfully requested in light of the previous amendments and the following remarks.

Claims 1, 7 and 14, the only pending independent claims in this application, have each been rejected as being anticipated by the disclosure in U.S. Patent No. 6,107,920, hereinafter Eberhardt.

Claim 1, as presently amended, recites a method including providing an RF antenna on an item, and providing a RFID electronics module electrically coupling the RFID electronics module to the RF antenna on the item after the RF antenna is provided on the item, the coupling being a non-contact electrical coupling, thereby providing an RFID capability for the item.

Claim 7, as presently amended, recites a method including applying an RF antenna directly to an item, providing an RFID electronics module separate from the item and the RF antenna on the item, the RFID electronics module including electronics that provide an RFID capability when coupled to the RF antenna, and applying the RFID electronics module to the item after applying the RF antenna to the item, whereby the RFID electronics module is electrically coupled to the RF antenna by a non-contact coupling.

Claim 14, as presently amended, recites, in combination, an item having at least one surface and an RF antenna applied to the surface, and an RFID electronics module separate from the item and from the RF antenna on the item, the RFID electronics module including electronics which provide an RFID capability when coupled to the RF antenna, the RFID electronics module being applied to the item so as to be electrically coupled to the RF antenna and provide an RFID capability for

the item, the RF antenna being coupled to the RFID electronics module by a non-contact coupling.

Eberhardt describes direct attachment of an RFID chip to an antenna that is pre-printed on an item. However, there is clearly no mention of a non-contact coupling as recited.

Moreover, Eberhardt does not disclose an RFID electronics module as recited. The Examiner refers to element 12 of Eberhardt as an RFID electronics module. However, that element is a chip and not a module.

In light of the foregoing, Applicants respectfully submit that Claims 1, 7 and 14 are clearly patentably distinguishable from the disclosure in Eberhardt.

Section 4 of the Official Action refers to U.S. Patent No. 6,181,287, hereinafter Beigel. Beigel discloses RFID tag constructions that use non-contact coupling to couple an RFID chip through a substrate material to an antenna applied to the other side of the substrate. However, Beigel does not disclose the use of an RFID electronics module. By contrast, a chip-on-module approach allows for much easier application of the chip, as part of the module, to the tagged item. Application of the chip module is akin to applying a postage stamp, and with appropriate design of the coupling pads the technique can accommodate significant misalignment of the chip module when applied to the antenna on the tagged item. In Beigel, the chip is applied directly to the substrate material, which is a more delicate and precise process since the chip is a small fragile object with small connection pads. Thus, Beigel does not cure the above-noted deficiencies in Eberhardt.

Section 6 of the Official Action refers to U.S. Patent No. 6,770,509, hereinafter Halope. Halope describes use of a dielectric adhesive to support a chip that is being

directly attached to an antenna. The dielectric adhesive is simply for attachment and support purposes. This has nothing to do with non-contact coupling of an RFID electronics module, and in any event does not cure the above-noted deficiencies in Eberhardt.

Section 7 of the Official Action refers to U.S. Patent No. 6,050,622, hereinafter Gustafson. Gustafson discloses a method of providing tamper-indication in which a strong adhesive is used to disrupt an electrical circuit. Gustafson's tamper indication method is described in an entirely different context than that of the claimed method and combination, and in any event does not cure the above-noted deficiencies in Eberhardt.

For the above reasons, Applicants respectfully submit that Claims 1, 7 and 14 are patentably distinguishable from the applied prior art. Withdrawal of the rejections of independent Claims 1, 7 and 14 is therefore respectfully requested.

The dependent claims are allowable at least by virtue of their dependence from allowable independent claims. The dependent claims also recite further distinguishing aspects of the method and combination at issue here. For example, Claim 4 recites that the item includes an inside surface and an outside surface and that the method further includes providing the RF antenna on the inside surface of the item and attaching the RFID electronics module in an adjacent position to the outside surface of the item. The Official Action refers to the disclosure in Eberhardt regarding this feature. However, nowhere does Eberhardt describe a chip being on one side of a substrate material and the antenna on the other side. What Eberhardt does describe is a chip being applied to a compressed region on a substrate so as to protect the chip, and in one embodiment the substrate is folded into a container such

that the chip and antenna are on the inside of the container. Eberhardt's comments about reducing orientation sensitivity refer to the ability to read the RFID tag at different orientations, and have nothing to do with orientation of the chip on the antenna.

Early and favorable action with respect to this application is respectfully requested.

Should any questions arise in connection with this application or should the Examiner believe that a telephone conference with the undersigned would be helpful in resolving any remaining issues pertaining to this application, the undersigned respectfully requests that he be contacted at the number indicated below.

The Director is hereby authorized to charge any appropriate fees under 37 C.F.R. §§ 1.16, 1.17 and 1.20(d) and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 02-4800.

Respectfully submitted,

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